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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
EUREKA DIVISION**

BRIAN CHAVEZ and BRANDON  
BRACAMONTE, on behalf of  
themselves and all others similarly  
situated,

*Plaintiffs,*

v.

COUNTY OF SANTA CLARA,

*Defendant.*

Case No. 1:15-cv-05277-RMI

**STIPULATION TO WITHDRAW  
CERTAIN EXHIBITS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
CONTEMPT AND ORDER**

**Magistrate Judge Robert M. Illman**

In 2019, this Court approved a Consent Decree that required, among many other things, that the County employ sufficient custody staff at the Santa Clara County jails to provide members of the Plaintiff Class adequate access to medical and mental health services. ECF No. 106. On November 17, 2025, Plaintiffs filed a Motion for Contempt against the Defendant County of Santa Clara. ECF No. 155. The Motion sought a finding of contempt against the County and monetary sanctions for the County's failure

1 to comply with the Consent Decree by employing sufficient custody staff to provide  
2 adequate access to healthcare services. *Id.*

3 The motion was supported by the declaration of Donald Specter which  
4 authenticated and attached 27 exhibits. *Id.* Included within those exhibits were two  
5 types of reports required by the Consent Decree: (1) 180-day reports prepared by the  
6 County, and (2) periodic reports prepared by experts selected by the parties to monitor  
7 the County's compliance with the requirements of the Consent Decree. *Id.* These  
8 reports were not filed on the docket and some of them were labeled as "Confidential".

9 After the Specter declaration and exhibits were filed, the County requested that  
10 Exhibits 2 through 19, 21, and 26 be filed under seal. A description of each of those  
11 exhibits is set forth below. Pursuant to Defendant's request, Plaintiffs' counsel called  
12 the docket clerk and requested that all exhibits be sealed pending an administrative  
13 motion to have the exhibits 2 through 19, 21, and 26 sealed. All the exhibits were sealed  
14 as requested.

15 The parties disagree about whether exhibits 2 through 19, 21, and 26 meet the  
16 requirements for the sealing of exhibits pursuant to Civil Local Rule 79-5. In order to  
17 resolve the issue, the Defendant County agrees that all of the facts in Plaintiffs' motion  
18 that are supported by any of Plaintiffs' exhibits are accurate representations of the facts  
19 stated in the cited exhibit(s). In light of this agreement, Plaintiffs withdraw Exhibits 2  
20 through 19, 21, and 26, provided that any of the withdrawn exhibits shall be provided  
21 to the Court upon its request.

	<b>Exhibits</b>
24	Exhibit 2: DRAFT Tenth Mental Health Monitoring Report
25	Exhibit 3: Seventh Mental Health Monitoring Report
26	Exhibit 4: Fifth Mental Health Monitoring Report
27	Exhibit 5: Fourth Mental Health Monitoring Report

1		<b>Exhibits</b>
2		Exhibit 6: Sixth Mental Health Monitoring Report
3		Exhibit 7: Eighth Mental Health Monitoring Report
4		Exhibit 8: Ninth Medical Monitoring Report
5		Exhibit 9: Third Mental Health Monitoring Report
6		Exhibit 10: County's 180-Day Mental Health Report, April 2025
7		Exhibit 11: County's 180-Day Mental Health Report, November 2024
8		Exhibit 12: Fourth Medical Monitoring Report
9		Exhibit 13: Sixth Medical Monitoring Report
10		Exhibit 14: Seventh Medical Monitoring Report
11		Exhibit 15: Eighth Medical Monitoring Report
12		Exhibit 16: County's 180-Day Medical Report, June 2025
13		Exhibit 17: County's 180-Day Medical and Dental Report, October 2022
14		Exhibit 18: County's 180-Day Medical Report, March 2024
15		Exhibit 19: County's 180-Day Mental Health Report, December 2022
16		Exhibit 21: County's 180-Day Mental Health Report, October 2025
17		Exhibit 26: Fifth Medical Monitoring Report
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1 **IT IS SO STIPULATED:**

2 Dated: December 11, 2025

**PRISON LAW OFFICE**

3 /s/ Donald Specter

4 Donald Specter  
5 Nicholas Sheehan  
6 Mackenzie Halter  
7 Prison Law Office

8 *Attorneys for Plaintiffs*

9 Dated: December 11, 2025

**SANTA CLARA COUNTY**

10 /s/ Aryn Paige Harris

11 Aryn Paige Harris  
12 Deputy County Counsel

13 *Attorney for Defendant*

14 **CERTIFICATION**

15 Pursuant to Civil Local Rule 5-1(i)(3), I attest that Aryn Paige Harris concurs in  
16 in the filing of this stipulation.

17 Dated: December 11, 2025

18 /s/ Donald Specter

19 Donald Specter

20 Pursuant to the Stipulation, **IT IS HEREBY ORDERED** that the Clerk shall  
21 remove exhibits 2 through 19, 21, and 26 from the docket, and unseal exhibits 1, 20,  
22 22, 23, 24, 25, and 27.

23 Dated: December 12, 2025

24 

25 ROBERT M. ILLMAN  
26 United States Magistrate Judge  
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